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**From:** Hutson, Nick [Hutson.Nick@epa.gov]  
**Sent:** 9/25/2018 12:04:41 PM  
**To:** Thompson, Lisa [Thompson.Lisa@epa.gov]  
**Subject:** Re: Confirmed + Materials: Meeting with Theresa Pugh Consulting, LLC on OOOOa and ACE

Lisa,

I'm not going to be able to attend this because it conflicts with the SPPD management mtg. Are you planning to listen? If so, can you take notes and give me a debrief afterwards?

Nick

Sent from my iPhone

> On Sep 24, 2018, at 5:33 PM, Hambrick, Amy <Hambrick.Amy@epa.gov> wrote:  
>  
> UPDATED:  
>  
> Hi Amy: Here are the handouts/slides for your EPA staff for our call tomorrow. The slides are in PowerPoint but can be printed out as "paper slides". We hope that the ACE team and OOOOa teams will stay on the conference call for the entire call as the issues in two rulemakings are linked.  
>  
> Dial in: 1-919-541-1958  
> No passcode  
>  
> Agenda:  
>  
> 10:30 self introductions  
>  
> \* EPA staff  
> \* Theresa Pugh, Theresa Pugh Consulting, LLC: brief explanation as to why the two rules are connected for dual fuel (oil and biomass), remaining useful life of plant, efficiency decisions, and methane leaks  
> \* Dave Fraley, MMUA (PE, PhD)  
> \* Carrie Annand, Biomass Power Association  
>  
> Listening by phone if available: Bob Cleaves, President, Biomass Power Association, Portland, OR & Mike Siefert (Missouri public power utilities)  
>  
> Presentations:  
> 10 minutes Dave Fraley: ACE (He has had computer problems today and will send paper later today—his router died).  
> 10 minutes Carrie Annand: ACE and why biomass as compliance options matters (PowerPoint Biomass & Carbon) (Two additional papers are offered for background).  
> 15 minutes Theresa Pugh: ACE and OOOOa and why the two rules will be connected (highlights: need for dual fuel permitting, methane leak repair time for compressor stations and pipelines serving power plants using NERC study)  
> PowerPoint slides (paper slides) "EPA ACE OOOOa Sept 2018 slides FINAL"  
>  
> 11:30-12:00 ET Time for Q and A or discussion of follow up  
>  
>  
> Thank you,  
>  
> Theresa  
> Theresa Pugh Consulting, LLC  
> 2313 North Tracy Street  
> Alexandria, VA 22311  
> 703-507-6843  
> [www.theresapughconsulting.com](http://www.theresapughconsulting.com)<<http://www.theresapughconsulting.com/>>  
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> Cc: Amy Hambrick <hambrick.amy@epa.gov<mailto:hambrick.amy@epa.gov>>  
> Subject: Request for appointment: September 17 or 18 (or 19) EPA-HQ-OAR-2017-0355  
> Dear Clint (and Nick),  
>  
> It dawned on me that you would probably be at the AAPCA meeting in Sept or perhaps be in RTP that week. Please see the note below requesting an appointment. It is my hope to meet with you, Amy and Nick's groups together. Please scroll down.  
>  
> I would make time to meet with all of you but hope your schedules make you available on Sept 17 after 2 or on Sept 18. I could make it Sept 19 if that is the only available time.  
>  
> My note to Nick and Amy is below. I accidentally mis-keyed Nick's email below.  
>  
> Thank you,  
>  
> Theresa Pugh  
> Owner  
> Theresa Pugh Consulting, LLC  
> pugh@theresapughconsulting.com<mailto:pugh@theresapughconsulting.com>  
> 703-507-6843  
>  
> From: <Pugh@theresapughconsulting.com<mailto:Pugh@theresapughconsulting.com>>  
> Date: August 23, 2018 at 4:53:43 PM EDT  
> To: Amy Hambrick <hambrick.amy@epa.gov<mailto:hambrick.amy@epa.gov>>, <nick.swanson@epa.gov<mailto:nick.swanson@epa.gov>>  
> Subject: Request for appointment: September 17 or 18  
> Dear Amy and Nick  
>  
> Good afternoon. I will be in RTP in Sept for the AAPCA meeting and wondered if there is an opportunity to meet with your staff regarding natural gas issues that are relevant for NSPS 111(d) (new ACE proposed rule) and the EPA's next steps on section 0000a on methane for new (or existing) pipelines and compressor stations serving power sector and LDCs.  
>  
> My clients are electric utilities and I have expertise with pipelines/compressor stations. I am active with NERC (unpaid advisor).  
>  
> If possible, I would like to come in and see your staff (both 111d team and 0000a) in the next month on some issues relevant to the "remaining useful life of the plant" and NERC's Nov 2017 study. I served on a NERC study in the last year as an unpaid advisor on natural gas issues. There are 23 areas in the US where more than one gas-fired power plants are served by only one pipeline with no redundancy in transmission pipelines or the underground gas storage. That places some risk for force majeure for power plants.  
>  
> NERC recommends that EPA and state agencies allow for a dual fuel approval in Title V permits when voltage support or force majeure events occur- even if during ozone season. This shouldn't mean a carte blanche to run oil units or create significant new ozone problems without justification. But NERC does find 23 area (some geographically small) with electricity reliability problems - at least until more gas storage and pipelines are built. This issue is both relevant to ACE and 111(d)). It is also important that those oil- fired or alternative fuel fired units meet all other relevant regulations including SPCC (RCRA). Many dual fuel plants in the US outside of New England have not maintained the tanks or lack sufficient footprint space to have more than 1-2 days of oil onsite.  
>  
> I will be at AAPCA meeting and will request to talk to Amy and Nick's group(s)- preferably together since the issues meet for gas generators.  
>  
> The link to the NERC study is  
> [https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC\\_SPOD\\_11142017\\_Final.pdf](https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_SPOD_11142017_Final.pdf)  
>  
> I look forward to seeing you- either in RTP on Sept 17-18 or via camera phone at a call in headquarters. I can easily go down to headquarters for a combination meeting. (I reached out to Wehrum earlier today asking if he could join in).  
>  
> I am available on Sept. 17 at 3-5 (following a drive down from DC) or on Sept 18  
>  
>  
>  
> Thank you,  
>  
> Theresa Pugh  
> Owner  
> Theresa Pugh Consulting, LLC  
> pugh@theresapughconsulting.com<mailto:pugh@theresapughconsulting.com>  
> 703-507-6843  
> [www.theresapughconsulting.com](http://www.theresapughconsulting.com)<<http://www.theresapughconsulting.com>>  
>  
> ~ a woman owned small business~  
>

>  
> Sent from mobile device, please excuse typos.  
>  
> ADDITIONAL BACKGROUND FROM 0000a MEETING LAST YEAR  
>  
> See attachment  
>  
> -----Original Appointment-----  
> From: Hambrick, Amy  
> Sent: Thursday, September 14, 2017 4:23 PM  
> To: Hambrick, Amy; RTP-Line-541-1595/Phone-Line/RTP-Conf-Bridge; Witosky, Matthew; Cozzie, David;  
Marsh, Karen; Witt, Jon; Thompson, Lisa; Garwood, Gerri; Howard, Jodi; Dewees, Jason; Macpherson, Alex;  
Mills, Kathy; Miller, Elizabeth; Davis, Alison; Weitz, Melissa; DeFigueiredo, Mark; Waltzer, Suzanne;  
Mia, Marcia; Carey, Angela  
> Cc: Swanson, Nicholas; Culligan, Kevin; Ayres, Sara; Lischinsky, Robert  
> Subject: CONFIRMED: meeting with Theresa Pugh Consulting (D201/ X4332)  
> When: Wednesday, September 20, 2017 1:00 PM-2:00 PM (UTC-05:00) Eastern Time (US & Canada).  
> Where: RTP-D201-Max40/RTP-Bldg-D; RTP-OAQPS-919-541-4332-SPPD/Phone-Line/RTP-OAQPS-BLDG-C  
>  
> Added presentation in email attached for those who will be calling in.  
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> Discussion: interface between electric utilities and natural gas storage  
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>  
> <EPA gas-electric Sept 2017 presentation.eml>  
> <Biomass Carbon Study Findings One Pager May 2017.pdf>  
> <Final BPA Khanna Dwivedi Biomass Carbon Study May 2017.pdf>  
> <Biomass & Carbon 9.25.18.pptx>  
> <EPA ACE 0000a Sept 2018slide presentation FINAL\_.pptx>  
> <meeting.ics>